UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT ADDICTION/PERSONAL INJURY PRODUCTS LIABILITY LITIGATION	Case No. 4:22-md-03047-YGR MDL No. 3047
This Document Relates to: Fairfax County Public Schools Member Case No.: 4:25-cv-06397	**LOCAL GOVERNMENT AND SCHOOL DISTRICT MASTER SHORT-FORM COMPLAINT AND DEMAND FOR JURY TRIAL**

The Plaintiff(s) named below file(s) this *Short-Form Complaint and Demand for Jury Trial* against the Defendant(s) named below by and through their undersigned counsel. Plaintiff(s) incorporate(s) by reference the allegations, claims, and relief sought in *Plaintiffs' Master Local Government and School District Complaint* ("Master Complaint") as it relates to the named Defendant(s) (checked-off below), filed in *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*, MDL No. 3047, in the United States District Court for the Northern District of California. Plaintiff(s) file(s) this *Short-Form Complaint* as permitted by Case Management Order No 8.

Plaintiff(s) indicate(s) by checking the relevant boxes below the Parties and Causes of Actions specific to Plaintiff(s)' case.

Plaintiff(s), by and through their undersigned counsel, allege(s) as follows:

I. DESIGNATED FORUM

1. *For Direct Filed Cases:* Identify the Federal District Court in which the Plaintiff(s) would have filed in the absence of direct filing:

United States District Court for the Eastern District of Virginia

2. *For Transferred Cases:* Identify the Federal District Court in which the Plaintiff(s) originally filed and the date of filing:

N/A

II. IDENTIFICATION OF PARTIES

A. PLAINTIFF(S)

3. *Plaintiff(s):* Name(s) of the local government or school district alleging claims against Defendant(s):

Fairfax County Public Schools

4. Number of schools served in the Plaintiff(s)' school district or local community:

223

5. Number of minors served in the Plaintiff(s)' school district or local community:

180,714

6. At the time of the filing of this *Short-Form Complaint*, Plaintiff(s) is/are a resident and citizen of [*Indicate State*]:

Virginia

B. DEFENDANT(S)

7. Plaintiff(s) name(s) the following Defendant(s) in this action [*Check all that apply*]:

META ENTITIES

- ☑ META PLATFORMS, INC., *formerly known as* Facebook, Inc.
- ☑ INSTAGRAM, LLC
- ☑ FACEBOOK PAYMENTS, INC.
- ☑ SICULUS, INC.
- ☑ FACEBOOK OPERATIONS, LLC
- ☑ FACEBOOK HOLDINGS, LLC
- ☑ META PAYMENTS INC.

TIKTOK ENTITIES

- ☑ BYTEDANCE LTD
- ☑ BYTEDANCE INC.
- ☑ TIKTOK LTD
- ☑ TIKTOK LLC
- ☑ TIKTOK INC.

SNAP ENTITY

- ☑ SNAP, INC.

GOOGLE ENTITIES

- ☑ GOOGLE, LLC
- ☑ YOUTUBE, LLC

OTHER DEFENDANTS

For each "Other Defendant" Plaintiff(s) contends are additional parties and are liable or responsible for Plaintiff(s)' damages alleged herein, Plaintiff(s) must identify by name each Defendant and its citizenship, and Plaintiff(s) must plead the specific facts supporting any claim against each "Other Defendant" in a manner complying with the requirements of the Federal Rules of Civil Procedure. In doing so, Plaintiff(s) may attach additional pages to this *Short-Form Complaint*.

NAME	CITIZENSHIP

III. CAUSES OF ACTION ASSERTED

8. The following Causes of Action asserted in the *Master Complaint*, and the allegations with regard thereto, are adopted in this *Short-Form Complaint* by reference (*check all that are adopted*):

Asserted Against[1]	Count Number	Cause of Action (COA)
☑ Meta entities ☑ Snap ☑ TikTok entities ☑ Google entities ☐ Other Defendant(s)[2]	1	NEGLIGENCE
☑ Meta entities ☑ Snap ☑ TikTok entities ☑ Google entities ☐ Other Defendant(s)	2	PUBLIC NUISANCE

NOTE

If Plaintiff(s) want(s) to allege additional Cause(s) of Action other than those selected in paragraph 8, which are the Causes(s) of Action set forth in the *Master Complaint*, the facts supporting those additional Cause(s) of Action, must be pled in a manner complying with the requirements of the Federal Rules of Civil Procedure. In doing so, Plaintiff(s) may attach additional pages to this *Short-Form Complaint*.

IV. ADDITIONAL CAUSES OF ACTION

9. Plaintiff(s) assert(s) the following additional Causes of Action and supporting allegations against the following Defendants:

[1] For purposes of this paragraph, "entity" means those Defendants identified in Paragraph 7 (*e.g.*, "TikTok entities" means all TikTok Defendants against which Plaintiff(s) is/are asserting claims).

[2] Reference selected "Other Defendants" by the corresponding row number in the "Other Defendant(s)" chart identified in Paragraph 7.

WHEREFORE, Plaintiff(s) pray(s) for relief and judgment against Defendants and all such further relief that this Court deems equitable and just as set forth in the *Master Complaint*, and any additional relief to which Plaintiff(s) may be entitled.

JURY DEMAND

Plaintiff(s) hereby demand a trial by jury as to all claims in this action.

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By signature below, Plaintiff(s)' counsel hereby confirms their submission to the authority and jurisdiction of the United States District Court of the Northern District of California and oversight of counsel's duties under Federal Rule of Civil Procedure 11, including enforcement as necessary through sanctions and/or revocation of *pro hac vice* status.

/s/ Kirk Goza

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